

EXHIBIT A



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March 1, 2024

VIA HAND DELIVERY

The Honorable Richard F. Boulware, II
United States District Judge
United States District Court for the
District of Nevada
333 Las Vegas Boulevard South
Las Vegas, NV 89101

Re: *Le, et al. v. Zuffa, LLC*, Civil Case No. 2:15-cv-01045-RFB-BNW

Dear Judge Boulware:

In accordance with the Court's Amended Joint Stipulated Pre-Trial Schedule entered on February 27, 2024 (ECF No. 990), the Plaintiffs hereby submit the enclosed flash drive, which contains:

1. Plaintiffs' Exhibit List (PTX exhibits) in Excel format which lists those exhibits Plaintiffs propose to use at trial to which Defendant Zuffa, LLC has lodged unresolved objections. The spreadsheet contains Defendant's objections by code and Plaintiffs' initial responses thereto; and
2. Copies of each of the PTX exhibits.¹

The parties' deposition designations have been submitted under separate cover by Zuffa's counsel. Plaintiffs note that Zuffa is including the deposition designations for Joseph Silva with that packet. Plaintiffs object to the inclusion of the Silva designations. On February 23, 2024, Zuffa informed Plaintiffs that Zuffa was determining whether Joseph Silva was available to testify "live" at the trial. Prior that date, the parties had exchanged initial designations and counter-designations as well as objections to the initial designations for Mr. Silva. However,

¹ Please note that there are five PTX exhibits that Plaintiffs do not currently possess. Four of them are videos in Zuffa's sole possession (PTX-0125, PTX-0126, PTX-0127 and PTX-0136). Plaintiffs will provide copies to the Court of these five exhibits as soon Plaintiffs secure copies of them.

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given Zuffa's representation that Mr. Silva may appear to testify live voluntarily, Plaintiffs have reserved the right to respond to Defendant's objections to Plaintiffs' designations, object to Defendant's counter-designations, and propose any appropriate counters to Defendant's counter-designations should Defendant inform Plaintiffs that Joseph Silva will not testify live at trial. As a result, the deposition designations for Mr. Silva are incomplete, and Defendant has included those incomplete deposition designations for Mr. Silva over Plaintiffs' objection.

Please contact us if you have any questions or need any further information.

Respectfully submitted,

Eric L. Cramer
*Counsel for the Class and Attorney for All
Individual and Representative Plaintiffs*

ELC/sll
Enclosure

cc: Defense Counsel (w/o encl.) (via ECF)